

4. Equifax accepts information on a consumer's credit only from those sources of credit information, which includes banks, creditors and merchants, that, either on the basis of prior experience, or because of the particular source's reputation, are determined by Equifax to be reasonably reliable sources of information.

5. In order to provide more prompt, current and complete records to its customers, Equifax operates an automated credit reporting system. A consumer's credit file is contained in a data bank stored in a computer system that is regularly updated via automated computer tapes or from information transmitted directly by credit grantors and other subscribers.

6. Should any information Equifax is reporting be disputed, Equifax initiates reinvestigation procedures to verify the information obtained from the source. Equifax representatives open a separate computer file that captures the disputed data currently appearing on the credit file, and contacts the original source to investigate the dispute. Information that cannot be verified is suppressed so that it does not reappear even if the source continues to send the same data. A computer code, or any revisions to the account, are recorded in the investigation record and uploaded into the main credit database to effect the requested action.

7. Throughout the period I have served as an employee of the Office of Consumer Affairs, I have been responsible for supervising the disclosure of the content of consumers' credit files to those consumers and the handling of inquiries or disputes made by or on behalf of those consumers.

8. On March 18, 2004, Plaintiff apparently mailed to Equifax a dispute regarding accounts included on her Equifax credit file. While Equifax has no record of receiving this correspondence, Plaintiff contends that she disputed the accuracy of three accounts:

Providian Bancorp, acct. no. 446567090044; The Money Tree, acct. no. 3274; and Unifund Corporation, acct. no. PROVI-6567090044.

9. On March 29, 2005, Providian verified the information on Plaintiff's credit report for Providian account number 4465670900444969 as accurately reported by Equifax.

10. On April 4, 2005, in response to Equifax's reinvestigation, The Money Tree verified the information reported on Plaintiff's credit report for account number 3274 as accurately reported by Equifax.

11. On March 29, 2005, Equifax deleted the Unifund Corporation collections item from Plaintiff's credit file as Unifund did not respond to Equifax's reinvestigation request regarding that account.

12. Plaintiff's consumer credit file contains numerous derogatory entries, in addition to the three above-referenced accounts, that she has not disputed, including multiple charged off accounts, collections accounts and a repossession.

13. Equifax has not acted with malice or any intent to harm Plaintiff in the handling of her credit file.

FURTHER AFFIANT SAYETH NOT.



Lisa Willis

Sworn to and subscribed before
me this 22 day of June, 2005.



Notary Public D. MARTIN NOTARY PUBLIC
COBB COUNTY, GA
MY COMMISSION
EXPIRES 10/18/06